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June 17, 2021

Hon. Naomi Reice Buchwald United States District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

**RE:** Rachel Carol Filsoof v. Andrew J. Cole

Docket No.: 21cv1791(NRB)

Your Honor:

The parties respectfully request Court approval to a consensus relating to an amendment of Defendant's Answer/Counterclaims and the Plaintiff's Answer to the Counterclaims.

Today, during a conference held in accordance with Fed.R.Civ.P. 26(f), counsel for Andrew J. Cole advised that he had planned to file an Amended Answer/Counterclaims to correct a date. The Plaintiff consented, and Defendant also agreed that Plaintiff's Answer to the Counterclaims would follow the filing of the Amended Answer rather than the original due date which was today.

We respectfully ask the Court's approval. We never discussed however the deadline for the filing of the Defendant's proposed amendment, so on behalf of Plaintiff, I respectfully ask that the Court set a deadline for it.

Respectfully,

s/John P. Bostany

cc: Daniel J. Schneider, Esq. accordance

shall be due 21 days after service in accordance with

Application granted. Responsive pleadings

Federal Rule of Civil Procedure

12(a).

SO ORDERED.

NAOMI REICE BUCHWALD UNITED STATES DISTRICT JUDGE

Dated: New York, New York

June 22, 2021